

REMARKS

The above amendment with the following remarks is submitted to be fully responsive to the Office Action of January 14, 2005. Reconsideration of this application in light of the amendment and the allowance of this application are respectfully requested.

Claims 1-39 were pending in the present application prior to the above amendment. In response to the Office Action, claims 2, and 34 to 36 have been amended. Therefore, claims 1-39 are still pending in the present application and are believed to be in proper condition for allowance.

Initially, it is respectfully noted that a new Power of Attorney with Change of Correspondence Address was filed on November 16, 2004 in the present case. However, correspondences from the USPTO are still being sent to the previous attorney instead of the newly appointed attorneys associated with Customer Number 22204 as requested. Copies of the previously submitted Power of Attorney and the Transmittal Form are enclosed herewith. Immediate correction to the correspondence address is requested so that all future correspondences can be sent to the proper representatives designated.

Referring now to the Office Action, claims 1-39 were rejected under 35 U.S.C. as being anticipated by U.S. Patent No. 5,740,425 to Povilus. The applicants respectfully disagree for various reasons set forth in detail below. Based on the Examiner's rejections, it appears that the Examiner does not appreciate important aspects of the present invention. The present invention relates to method and systems for distributing and maintaining product data. As described in the specification, the customers of the product data as provided by the present invention can then use the provided product data to generate catalogs for users who can purchase desired products from the customers of the product data. Thus, the method of the present embodiment allows providing of product data to customers, who in turn, generate catalogs for users.

The cited Povilus reference discloses a data structure and method for creating, maintaining, and publishing multiple renditions of both electronic and printed, single and multi-manufacturer catalogs using a single product database. The disclosed data structure includes means for creating a product database that includes a listing of SKUs, each SKU corresponding to a product or a component of a product. The product database is further

described as including product information for each associated SKU, and an identification of each concept node or class of products in which each SKU can be located. Thus, Povilus discloses a method in which a data structure is used to create a product database that includes SKUs of products based on the class/group of products.

Referring now to the Office Action, Examiner asserts that independent claims 1, 31 to 33 are anticipated by Povilus. The Examiner cites Col. 6, lines 55-65 of Povilus as disclosing storing of product data that includes both a manufacturer SKU and a customer SKU that identifies the product, where the customer SKU is associated with a customer. The applicant disagrees with the Examiner's assertion and request clarification as to the basis for this assertion.

Claim 1 of the present application recites a method for distributing data for use in a catalog which includes capturing product data for one or more products according to a data model, and storing the product data captured. Claim 1, as well as rejected claims 31 to 33, further recite that product data includes both a manufacturer SKU that identifies each of the products, and customer SKU that identifies each of the products for one or more customers requesting that the specified product data be distributed for use in a catalog. Each customer SKU is associated with a customer for which the product data is being stored for subsequent distribution to the customer. This provision of both the manufacturer SKU and the customer SKU is an important feature of the present embodiment because it greatly facilitates the customers' ability to generate a catalog for the users. For example, if the customer is a retailer, the present embodiment allows the customer to receive product data with the SKU of the manufacturer of the product, and its own SKU. This allows the catalog to be easily generated by the customer since it can use its own SKU, without requiring modification of the data or inputting of additional data.

The portion of Povilus cited by the Examiner discloses a product database having a listing of products that can be identified by their SKU number which uniquely identifies products that the manufacturer or distributor keeps in stock. Thus, only one SKU is disclosed. In this regard, Povilus illustrates an example product database template in Figure 19 in which only one type of SKU is shown. Thus, Povilus fails to disclose SKU from both a manufacturer and a customer as recited in claims 1, 31 to 33. Therefore, because the cited reference does not "teach every aspect of the claimed invention" as

required under 35 U.S.C. § 102, this rejection should be withdrawn, and these independent claims allowed. (See MPEP §§ 706.02 and 2131). To the extent that this rejection is not withdrawn, the Examiner is requested to explain the Examiner's rationale in more detail as to how the cited limitations are disclosed in Povilus, and the specific application of the features of Povilus that correspond to the recited limitations, since the present Office Action is wholly unclear in this regard.

Referring again to the Office Action, independent claims 2, and 34 to 36 were rejected as also being anticipated by Povilus. The applicants respectfully disagree and contend that the cited Povilus reference does not disclose each and every feature of these rejected claims. Claim 2, for example, recites a method of maintaining catalog data stored in a system product data file in which a customer product portfolio file is received. The customer product portfolio file includes at least one SKU associated with each product for which data is requested by a customer for use in a catalog. The claim recites that customer product portfolio file is mapped to the system product data file such that each product identified in the customer product portfolio file for which data is not in the system product data file is identified. This allows indication of whether data for each of the products for which data is requested by the customer has been obtained and stored in the system product data file. The method further includes capturing data for one or more products identified in the customer product portfolio file that is not in the system product data file, and adding the captured data for the products to the system product data file.

Whereas Povilus does appear to provide a method and system for creating and naming a new product for storage in a database, this is attained by allowing manual selection of the desired type of change, by creating a new record, and naming the new product in the manner shown in Figure 31B. However, the Povilus reference does not disclose a customer product portfolio file that is distinct from the system product data file. Thus, Povilus does not disclose mapping the customer product portfolio file to the system product data file so as to identify data that is not in the system product data file. Correspondingly, Povilus also does not disclose indicating whether data for each of the products for which data is requested by the customer has been obtained and stored in the system product data file. Moreover, whereas provisions are made for adding additional data in the method and system disclosed in Povilus, there is no provisions for capturing the

data to be incorporated much less capturing particular data for one or more products identified in the customer product portfolio file that is not in the system product data file.

In the Office Action, the Examiner cited Cols. 7 and 8 of Povilus as disclosing a method of maintaining a catalog data stored in a system product data file recited in these claims. Footnote 1 in the Office Action notes that the Examiner is interpreting the "Definer" as corresponding to the recited customer SKU of these claims. However, the relevance of the cited columns of Povilus is wholly not clear as the cited sections have nothing to do with the recited limitations of the claims. It is also not clear what the relevance of the Definer is and why the Examiner is interpreting it to correspond to the customer SKU. Povilus explains that a "Definer" is a phrase having a definition and exists to give meaning to nodes in a concept structure so as to facilitate understanding between the provider of the products, and the seeker of the products which are categorized. (See Col. 7, lines 13-26). In other words, a "Definer" is a word or phrase for a node or category likely to convey the identity of the product, and neither refers to a SKU, nor perform a function similar to a SKU.

Therefore, there is no provision made in Povilus for receiving a customer product portfolio file, mapping of file to the system product data, or capturing data for the product identified in the customer product portfolio file as recited in these claims. Thus, Povilus fails to anticipate the present invention as claimed in claims 2, 34 to 36, and the withdrawal of this rejection is respectfully requested.

Regardless of the above noted deficiencies in the rejection, to further distinguish the present invention as defined in independent claims 2, and 34 to 36, these claims have been amended to specifically recite that the mapping of the customer product portfolio file to the system product data file is performed electronically. Clearly, the cited Povilus reference fails to disclose, teach, or otherwise suggest electronic mapping, especially since customer product portfolio file is not disclosed. Therefore, for the forgoing reasons, the allowance of these claims are respectfully requested. Again, to the extent that this rejection is not withdrawn, the Examiner is requested to explain the Examiner's rationale in more detail as to how the cited limitations are disclosed in Povilus, and the specific application of the features of Povilus that correspond to the recited limitations, since the present Office Action is wholly unclear in this regard.

Referring again to the Office Action, dependent claims 3-12 were also rejected as being anticipated by the Povilus. However, these claims are dependent upon independent claim 2 which, as discussed above, is believed to be in proper condition for allowance. Therefore, these dependent claims are believed to also be allowable at least for the reason of their dependency on an allowable independent claim. In addition, the Examiner's citation of various portions of Povilus as anticipating the recited invention is also not understood. For example, dependent claim 5 further recites generating an enriched product data from the system product data file according to a customer profile. Page 36, line 24 to Page 37, line 21 of the Specification of the present application describes the possible features and advantages in generating enriched product data from the system product data file according to a customer profile. Such customer profile may include mapping tables with information regarding the customer and the customer's preferences with respect to receiving product data. As noted in the Specification, such customization may be based upon language, one or more components, attributes, etc. This allows customization of what product data is provided to which customer so that the customers do not receive all the product data, but instead, only receive data that has been indicated as being desired.

The Examiner cites Col. 8, lines 34-39 of Povilus as disclosing the limitations of claim 5, and further explains in Footnote 2 that the Examiner interprets "the further details disclosed by Povilus corresponds to enriched claimed." The cited portion of Povilus is directed to the Definer which, as noted previously, is a phrase for a node or category likely to convey the identity of the product. The cited portion discloses various definers can be used as set forth in Figure 5. This has nothing to do with enriching the product data with additional information, or to a customer profile as recited in claim 5. Moreover, it is not understood how the Examiner can interpret "Definer" as corresponding to the customer SKU relative to claim 2 as noted in Footnote 1, and interpret the same term as to further mean generating an enriched product data from the system product data file according to a customer profile, such interpretation clearly not being supported in the disclosure of Povilus. Correspondingly, the allowance of dependent claims 3-12 is also respectfully requested.

Referring again to the Office Action, independent claims 13 and 37 were rejected as being anticipated by Povilus. Again, the applicants respectfully disagree with the rejection. These claims recite receiving a customer product portfolio file, and mapping the customer product portfolio file to the system product data file such that each product for which data is in the system product data file is identified. In addition to mapping which is not disclosed in Povilus as discussed above, these claims further recite generating enriched product data according to a customer profile, the customer profile indicating data associated with products for which values are to be transmitted to the customer. As discussed above relative to dependent claim 5, such customer profile may include mapping tables with information regarding the customer and the customer's preferences with respect to receiving product data. Such customization may be based upon language, one or more components, attributes, etc. to allow customization of what product data is provided to which customer so that the customers only receive data that has been indicated as being desired.

In rejecting claims 13 and 37, the Examiner cited Col. 10, lines 27-50 of Povilus (in contrast to Col. 8 which was cited relative to claim 5) as disclosing the limitations of these claims. However, the cited portion of Povilus does not disclose, or relate to, receiving a customer product portfolio file, mapping the customer product portfolio file to the system product data file, and/or generating enriched product data according to a customer profile. Instead, the cited portion discloses activities of a lead engineer in listing, and viewing, the available products which appears to be completely irrelevant to the cited limitations. Correspondingly, in view of the above, this rejection is also believed to be improper and the withdrawal of this rejection and the allowance of independent claims 13 and 37 are requested.

Dependent claims 14-20, and 30 were also rejected as being anticipated by the Povilus. However, these claims are dependent upon independent claim 13 which, as discussed above, is believed to be in proper condition for allowance. Therefore, these dependent claims should also be allowed, at least for the reason of their dependency on an allowable independent claim. Whereas the Examiner rejected these claims citing various portions of Povilus, these cited portions are not relevant to the limitations recited in the claims and/or does not disclose the recited limitations. Correspondingly, because these

rejections are also improper, the applicants request the withdrawal thereof, and the allowance of these dependent claims.

Referring again to the Office Action, independent claim 21 was also rejected as being anticipated by Povilus. However, claim 21 recites a customer product portfolio file including a manufacturer SKU, and a customer SKU which is not disclosed, taught, or otherwise suggested by Povilus as discussed above relative to independent claim 1. The portion of Povilus cited by the Examiner discloses a normalized SKU. However, the specification of Povilus discloses that the normalized SKU is the manufacture's SKU which has been processed to be either generic to a family of related products, or processed to be more specific to distinguish options available for a particular product. (See Col. 21, lines 32-43). Thus, the customer SKU recited in this claim is not disclosed, taught, or otherwise suggested. Therefore, because Povilus fails to disclose each and every feature of the claim, the withdrawal of this rejection is requested.

Dependent claims 22-25, and 29 were also rejected as being anticipated by the Povilus. However, these claims are dependent upon independent claim 21 which is believed to be in proper condition for allowance. Therefore, these dependent claims are also in proper condition for allowance, at least for the reason of their dependency on an allowable independent claim. Thus, the applicants request the withdrawal of this rejection, and the allowance of these dependent claims.

Independent claim 26 was rejected as also being anticipated by Povilus. The applicants disagree with this rejection. It is noted that present claim 26 recites accepting a selection of at least one of the set of attributes which correspond to a category, and accepting a selection of products within the category. The system and method disclosed in Povilus allows searching and retrieval of product information from a database. In this regard, Povilus allows accepting a selection of a product in a category. However, the reference does not specifically recite acceptance of an attribute associated with a product. Thus, whereas Povilus discloses acceptance of a selection of a product, it does not allow searching for products based upon attributes of the products such as speed of a processor, a size of memory, etc. As in the example category of computers. Thus, it is believed that the Examiner's rejection of claim 26 is improper since Povilus does not disclose each and every feature of the recited claim. Therefore, the allowance of claim 26 is requested.

Dependent claim 27 was also rejected as being anticipated by Povilus. However, claim 27 is dependent upon allowable claim 26 discussed above. Therefore, the withdrawal of this rejection, and the allowance of claim 27 is also requested.

Referring again to the Office Action, independent claim 28 was rejected as being anticipated again by Povilus. The applicants again disagree with the Examiner's rejection. Independent claim 28 recites a method of querying including accepting a user query specifying a product as well as a catalog component that is to be retrieved. This means that the customer can customize the type of information regarding a product which is to be retrieved from the database. Correspondingly, the customer is not provided with all the information associated with the product, but only the type of information desired by the customer. Thus, the customer can provide a query that specifies that one or more of the catalog components such as the product description, technical specifications, a marketing description, an image, and/or a URL is to be provided as a result of the query. In this regard, the claim further recites obtaining of a catalog component definition that is associated with the catalog component, and defines a format for the catalog component. Clearly, the cited Povilus reference does not disclose these features. The portions of the Povilus reference cited and relied upon by the Examiner do not appear to be related at all to the recited limitations of this claim. Therefore, because the cited reference does not "teach every aspect of the claimed invention" as required under 35 U.S.C. § 102, this rejection should be withdrawn and this independent claim allowed. To the extent that this rejection is not withdrawn, the Examiner is requested to explain the Examiner's rationale for the rejection in more detail as to how the cited limitations are disclosed in Povilus, and how the features of Povilus specifically correspond to the recited limitations in application.

Referring again to the Office Action, the Examiner rejected independent claims 37 to 39 as being anticipated by Povilus. However, the Office Action fails to provide any discussion of the basis or rationale for this rejection. Regardless of this omission, it is respectfully noted that these independent claims all recite a customer profile. As discussed above relative to independent claim 13 as well as dependent claim 5, the customer profile indicates, inter alia, data associated with products for which values are to be transmitted to the customer, and may include mapping tables with information

regarding the customer, as well as the customer's preferences with respect to receiving product data. This allows customization, for example, based upon language, one or more components, attributes, etc., to allow customer control of what product data is provided to which customer so that the customers only receive data that has been indicated as being desired. Povilus fails to disclose, teach, or otherwise suggest such a limitation. Therefore, the withdrawal of this rejection and the allowance of these claims are also requested.

Finally, as it has been noted in the above remarks, many sections of the Povilus reference that were cited and relied upon by the Examiner appear to be irrelevant to the limitations of the claimed invention to which they are applied. Whereas significant effort was made to follow the Examiner's rationale and reasoning behind the rejection in view of the cited reference, such rationale and reasoning remains unclear in many instances of the Examiner's rejection. To the extent that any of the rejections addressed above are maintained by the Examiner, the applicants specifically request that the Examiner specifically, and more fully, explain which portions of Povilus is being interpreted to mean which recited limitation, the rationale as to why such interpretation is being made, and how the present invention is rendered unpatentable.

In view of the foregoing, it is submitted that the present application is in condition for allowance and a notice to that effect is respectfully requested. However, if the Examiner deems that any issue remains after considering this response, he is invited to call the undersigned to expedite the prosecution and work out any such issue by telephone.

Respectfully submitted,



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